

Eric L. Cramer (*pro hac vice*)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: (215) 875-3000
Facsimile: (215) 875-4604
ecramer@bm.net

WILLIAM A. ISAACSON (*pro hac vice*)
PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP
2001 K Street, N.W.
Washington, DC 20006
Tel: (202) 223-7300; Fax: (202) 223-7420
wisaacson@paulweiss.com

*Co-Lead Counsel for the Class and Attorney for
All Individual and Representative Plaintiffs*

Attorney for Defendant Zuffa, LLC

[Additional Counsel Listed on Signature Page]

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

No.: 2:15-cv-01045-RFB-(BNW)

**JOINT MOTION FOR EXTENSION OF
TIME TO FILE UNSEALED RECORD**

(First Request)

1 Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rules IA 6-1 and
2 26-3 of this Court, Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier
3 Vazquez, and Kyle Kingsbury (“Plaintiffs”) and Defendant Zuffa, LLC (“Zuffa,” and collectively
4 with Plaintiffs, the “Parties”), hereby jointly submit this motion for an extension of time to file the
5 supplemental unsealed record.
6

7 On August 21, 2023, the Court ordered the Parties to jointly file the unsealed record, except
8 for personal identifying information and medical information, no later than October 31, 2023. *See*
9 Aug. 21, 2023 Hr’g Tr. at 34-37, ECF No. 846; ECF No. 847. The Parties respectfully move the
10 Court to extend the deadline to December 15, 2023. This is the Parties’ first motion for an
11 extension of time to file the unsealed record.
12

13 The Parties continue to meet and confer regarding the joint unsealing and, pursuant to LRs
14 IA 6-1 and 26-3, have good cause for their request for an extension. As the Court acknowledged
15 in the August 21, 2023, hearing, the process of reviewing the entire voluminous record is a
16 “difficult process because of the amount of discovery” that occurred in this case. Aug. 21, 2023
17 Hr’g Tr. 35:1-2. Good cause exists due to the large size and age of the record in this case, and
18 also—as the Court stated—the importance of submitting a thorough and complete record that
19 appropriately balances “the public interest as it relates these records,” on the one hand, with the
20 importance of safeguarding individuals’ “personal-identifying information” and “medical
21 information,” on the other hand. *Id.* 34:11-25. These factors, as well as the Parties’ attention to
22 other pressing aspects of this case—including Zuffa’s October 24, 2023 motions for summary
23 judgment, ECF Nos. 878-880, and motion to reopen discovery, ECF No. 884, and Zuffa’s October
24 26, 2023 motion to treat fact evidence produced in *Johnson* litigation as if it was also produced in
25
26
27
28

1 *Le*, ECF No. 885—weigh heavily in favor of granting the Parties’ joint motion for an extension of
2 time to file the unsealed record.
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 DATED: October 30, 2023

Respectfully Submitted,

2
3 By: /s/ Eric Cramer
Eric L. Cramer

4 BERGER MONTAGUE PC
Eric L. Cramer (admitted *pro hac vice*)
5 Michael C. Dell'Angelo (admitted *pro hac vice*)
Patrick F. Madden (admitted *pro hac vice*)
6 Najah Jacobs (admitted *pro hac vice*)
1818 Market Street, Suite 3600
7 Philadelphia, PA 19103
Phone: (215) 875-3000/Fax: (215) 875-4604
8 ecramer@bm.net
mdellangelo@bm.net
9 pmadden@bm.net
njacobs@bm.net

10 BERGER MONTAGUE PC
Joshua P. Davis (admitted *pro hac vice*)
11 505 Montgomery Street, Suite 625
12 San Francisco, CA 94111
jdavis@bm.net

13 JOSEPH SAVERI LAW FIRM, LLP
14 Joseph R. Saveri (admitted *pro hac vice*)
Kevin E. Rayhill (admitted *pro hac vice*)
15 601 California Street, Suite 1000
San Francisco, California 94108
16 Phone: (415) 500-6800/Fax: (415) 395-9940
jsaveri@saverilawfirm.com
17 krayhill@saverilawfirm.com

18 COHEN MILSTEIN SELLERS & TOLL, PLLC
19 Benjamin D. Brown (admitted *pro hac vice*)
Richard A. Koffman (admitted *pro hac vice*)
20 Daniel H. Silverman (admitted *pro hac vice*)
1100 New York Ave., N.W., Suite 500, East
21 Tower Washington, DC 20005
Phone: (202) 408-4600/Fax: (202) 408 4699
22 bbrown@cohenmilstein.com
rkoffman@cohenmilstein.com
23 dsilverman@cohenmilstein.com

24 *Co-Lead Counsel for the Class and Attorneys for*
25 *All Individual and Representative Plaintiffs*

1 KEMP JONES, LLP
2 Don Springmeyer (Nevada Bar No. 1021)
3 3800 Howard Hughes Parkway, 17th Floor
4 Las Vegas, Nevada 89169
(702) 385-6000/Fax: (702) 385-6001
d.springmeyer@kempjones.com

*Liaison Counsel for the Class and Attorneys for
All Individual and Representative Plaintiffs*

6 WARNER ANGLE HALLAM JACKSON &
7 FORMANEK PLC
8 Robert C. Maysey (admitted *pro hac vice*)
9 Jerome K. Elwell (admitted *pro hac vice*)
2555 E. Camelback Road, Suite 800
Phoenix, AZ 85016
Phone: (602) 264-7101/Fax: (602) 234-0419
rmaysey@warnerangle.com
jelwell@warnerangle.com

*Counsel for the Class and Attorneys for All
Individual and Representative Plaintiffs*

13 By: /s/ William A. Isaacson
14 William A. Isaacson

15 William A. Isaacson (*pro hac vice*)
16 PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
2001 K Street, NW
Washington, DC 20006
Telephone: (202) 223-7313
Facsimile: (202) 379-4937
Email: wisaacson@paulweiss.com

19 Donald J. Campbell
20 J Colby Williams
21 CAMPBELL & WILLIAMS
710 South Seventh Street, Ste. A
Las Vegas, NV 89101
Telephone: (702) 382-5222
Facsimile: (702) 382-0540
Email: djc@cwlawlv.com
Email: jcw@cwlawlv.com

Attorneys for Defendant Zuffa, LLC

ATTESTATION OF FILER

The signatories to this document are myself and Eric Cramer, and I have obtained Mr. Cramer's concurrence to file this document on our joint behalf.

Dated: October 30, 2023

/s/ William A. Isaacson
William A. Isaacson

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Parties' Joint Agreed Motion for Extension of Time to File Unsealed Record was served on October 30, 2023, via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

Dated: October 30, 2023

/s/ William A. Isaacson
William A. Isaacson